



DEC 18 2014 12-15-14

Office of Air, Waste & Toxics

December 15, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: December 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the December 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from November 15, 2014, to December 15, 2014.

#### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- Baxter has received the final results for the bench-scale pilot testing program, and is preparing a report summarizing results.

Baxter conducted routine quarterly groundwater monitoring activities for the fourth quarter during the week of November 17, 2014.

#### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system during the next reporting period.
- Baxter will submit to EPA the Third Quarter 2014 Operations and Monitoring Report on or before December 27, 2014.
- Baxter will submit to EPA the 2014 Stand Alone Data Document (SADD) on or before December 31, 2014.



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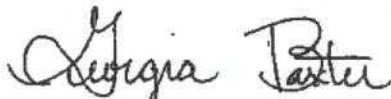
Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

#### CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

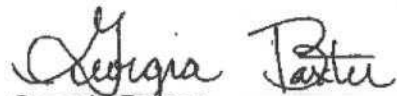
Signature:



Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: December 15, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group





Received

NOV 21 2014

November 17, 2014

Office of Air, Waste & Toxics

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

WA 3019

14 F

11-17-2014

**Subject: November 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the November 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from October 15, 2014, to November 15, 2014.

### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- Baxter has received the final results for the bench-scale pilot testing program, and is preparing a report summarizing results.

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### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter plans to conduct routine quarterly groundwater monitoring activities for the fourth quarter during the week of November 17, 2014.

### **OTHER INFORMATION**

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

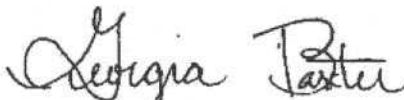
- Baxter has no other information to report.





## CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:   
Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: November 17, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,

  
Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC





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10-15-2014

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OCT 20 2014

Office of Air, Waste & Toxics

October 15, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: October 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the October 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from September 15, 2014, to October 15, 2014.

### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- Baxter conducted routine quarterly groundwater monitoring activities during on September 28<sup>th</sup> and 29<sup>th</sup>, 2014.

### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter recently received the final results for the bench-scale pilot testing program, and is evaluating and assembling the data.

### **OTHER INFORMATION**

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

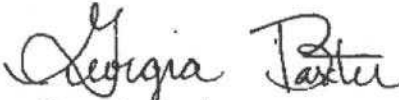
- Baxter has no other information to report.



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445-2100  
**CERTIFICATION**

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:   
Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: October 15, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,

  
Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC







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SEP 19 2014

Office of Air, Waste & Toxics

September 15, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: September 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the September 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from August 15, 2014, to September 15, 2014.

### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- On September 12, 2014, Baxter submitted the Second Quarter 2014 Operations and Monitoring Report.

### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter continues to evaluate soil and groundwater data generated from the Source Area Investigation.
- Baxter anticipates receiving final results from the bench-scale pilot testing program during the reporting period.

### **OTHER INFORMATION**

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

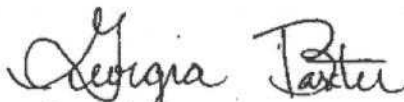


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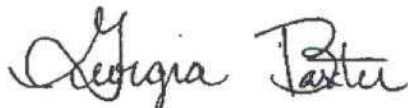
## CERTIFICATION

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Signature:   
Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: September 15, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC







WA 3019  
14F  
8/15/14

August 15, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: August 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the August 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from July 15, 2014, to August 15, 2014.

#### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- On July 15, 2014, Baxter submitted the Fourth Quarter 2013 Operations and Monitoring Report.
- On July 17, 2014, Baxter submitted the First Quarter 2014 Operations and Monitoring Report.

#### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter continues to evaluate soil and groundwater data generated from the Source Area Investigation.
- Baxter will submit the Second Quarter 2014 Operations and Monitoring Report.

#### **OTHER INFORMATION**

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

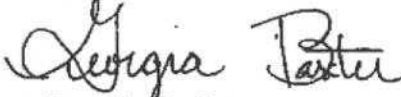


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- Baxter has no other information to report.

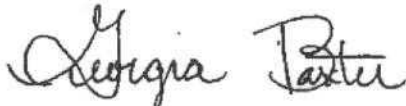
## CERTIFICATION

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Signature:   
Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: August 15, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC





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JUL 18 2014 7/15/2014

Office of Air, Waste & Toxics

July 15, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: July 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the July 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from June 15, 2014, to July 15, 2014.

#### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- Baxter has been revising the formats for the operations and monitoring reports, and preparing quarterly reports for internal review.
- On June 17, 2014, Baxter submitted the Revised Third Quarter 2013 Operations and Monitoring Report.
- On July 15, 2014, Baxter submitted the Fourth Quarter 2013 Operations and Monitoring Report.

#### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter continues to evaluate soil and groundwater data generated from the Source Area Investigation.
- Baxter will submit the First Quarter 2014 Operations and Monitoring Report and an updated schedule for completion of the Treatability Study.



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## OTHER INFORMATION

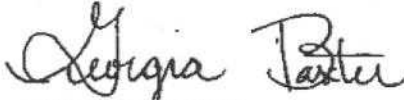
Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

## CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



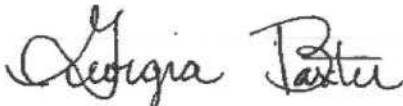
Name: Georgia Baxter

Title: Chief Executive Officer

Date: July 15, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC





WA3019  
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RECEIVED 6/16/2014

JUN 25 2014

Office of Air, Waste & Toxics

June 16, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: June 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the June 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from May 15, 2014, to June 15, 2014.

### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- Baxter has been revising the formats for the operations and monitoring reports, and preparing quarterly reports for internal review.

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### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter continues to evaluate soil and groundwater data generated from the Source Area Investigation.
- Baxter will submit a response to comments and a revised Third Quarter 2013 Operations and Monitoring Report on June 17, 2014. The 4<sup>th</sup> Quarter 2013 and 1<sup>st</sup> Quarter 2014 reports will be submitted during the reporting period by July 15, 2014.

### **OTHER INFORMATION**

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

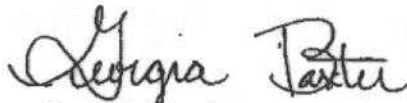


- Baxter has no other information to report.

### CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



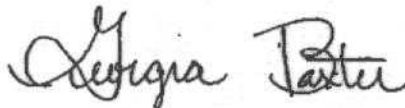
Name: Georgia Baxter

Title: Chief Executive Officer

Date: June 16, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC







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MAY 19 2014

Office of Air, Waste & Toxics

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5/15/14

May 15, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: May 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the May 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from April 15, 2014, to May 15, 2014.

### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- On April 17, 2014, Baxter received from EPA regarding Comments on Remedial Action Pilot Study Report, Third Quarter (Report). The comment letter contained a request for response and revisions to be submitted to EPA within 60 days.
- On April 21, 2014, Baxter met with EPA in Seattle to discuss progress on the Source Area Investigation and Chemical Oxidation Pilot Test Work Plan.

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### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter continues to evaluate soil and groundwater data generated from the Source Area Investigation.
- Baxter will continue to operate the Pilot Study remediation system during the next reporting period.



## OTHER INFORMATION

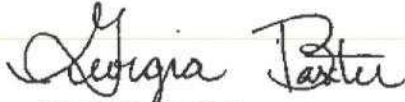
Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

## CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



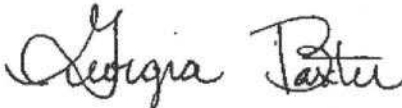
Name: Georgia Baxter

Title: Chief Executive Officer

Date: May 15, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC





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Office of Air, Waste & Toxics

April 15, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: April 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the April 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from March 15, 2014, to April 15, 2014.

### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- Treatability tests associated with the Source Area Investigation and Chemical Oxidation Pilot Test Work Plan were concluded during the prior reporting period, and the draft report was received from the testing laboratory for review.

### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter continues to evaluate soil and groundwater data generated from the Source Area Investigation.
- Baxter will continue to operate the Pilot Study remediation system during the next reporting period.
- Baxter will submit the Fourth Quarter 2013 Operations and Monitoring Report prior to the end of April 2014.



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## OTHER INFORMATION

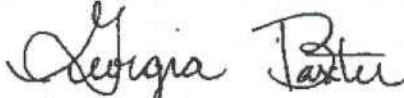
Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

## CERTIFICATION

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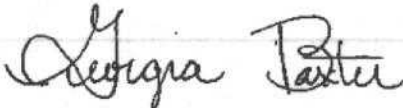
Name: Georgia Baxter

Title: Chief Executive Officer

Date: April 15, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC





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MAR 20 2014

Office of Air, Waste & Toxics

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3-17-14

March 17, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: March 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

FILE COPY

Dear Ms. Palumbo:

This letter provides the March 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from February 15, 2014, to March 15, 2014.

#### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- Treatability tests associated with the Source Area Investigation and Chemical Oxidation Pilot Test Work Plan were concluded during the reporting period, and samples are at the laboratory for chemical analysis.

On February 21, 2014, Baxter submitted the Third Quarter 2013 Operations and Monitoring Report.

#### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter continues to evaluate soil and groundwater data generated from the Source Area Investigation, and will receive the final report from the testing laboratory during the next reporting period.
- Baxter will continue to operate the Pilot Study remediation system during the next reporting period.
- Baxter will submit the Fourth Quarter 2013 Operations and Monitoring Report during the next reporting period.



## OTHER INFORMATION

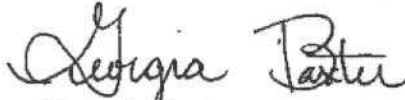
Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

## CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



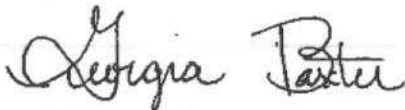
Name: Georgia Baxter

Title: Chief Executive Officer

Date: March 17, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC







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FEB 24 2014

Office of Air, Waste & Toxics

WA 3019  
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2/18/14

February 18, 2014

Ms. Jan Palumbo (AWT-121)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: February 2014 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the February 2014 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from January 15, 2014, to February 15, 2014.

#### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- The Remedial Action Pilot System continued to operate during the reporting period.
- Treatability tests associated with the Source Area Investigation and Chemical Oxidation Pilot Test Work Plan were ongoing and nearing completion during the reporting period.

#### **ANTICIPATED DEVELOPMENTS NEXT PERIOD**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter continues to evaluate soil and groundwater data generated from the Source Area Investigation.
- Baxter will continue to operate the Pilot Study remediation system during the next reporting period.
- Baxter will submit the Third Quarter 2013 Operations and Monitoring Report during the week of February 17, 2014.

FILE COPY



## OTHER INFORMATION

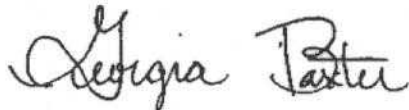
Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has no other information to report.

## CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

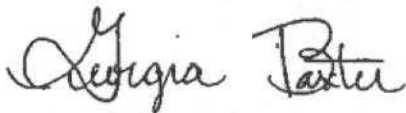
Signature:



Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: February 18, 2014

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group  
J. Stephen Barnett, AMEC

